

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

---

**Investigation by the Department on its own  
motion as to the propriety of the rates and  
charges set forth in M.D.T.E. No. 14,  
Transmittal No. TT 06-49, filed with the  
Department on June 16, 2006, by  
Verizon New England, Inc. d/b/a Verizon  
Massachusetts.**

---

)  
)  
)  
)  
)  
)  
)  
)  
)

**D.T.E. 06-61**

**PETITION OF RNK INC. D/B/A RNK TELECOM FOR LEAVE TO  
INTERVENE AS A PARTY**

Pursuant to M.G.L. c. 30A §10 and Section 1.03 of the Procedural Rules<sup>1</sup> of the Department of Telecommunications and Energy (“Department”), RNK Inc. d/b/a RNK Telecom (“RNK” or “Petitioner”), hereby petitions to intervene as a participant party in the above proceeding, stating in support thereof the following:

1. Petitioner RNK is a corporation organized and existing under the laws of the Commonwealth of Massachusetts. Its principal place of business is located at 333 Elm St., Suite 310, Dedham, MA 02026
2. Petitioner is a registered Competitive Local Exchange Carrier and Interexchange Carrier in the Commonwealth of Massachusetts and other states, and among other services, resells Verizon’s local exchange services to residential and business customers.

---

<sup>1</sup> 220 C.M.R. §1.03

3. Although resale of Verizon is not RNK's primary method of serving its customers, it allows RNK to reach customers and geographic areas that could not economically supported by other means of provision.

4. RNK would be directly, significantly, and substantially impacted by Verizon's proposed tariff filing, if allowed to go into effect. In particular, if the resale discount level were reduced, it would be not economically feasible to serve many, if not all, of its resold customer base in the Commonwealth of Massachusetts.

5. Furthermore, a decrease in the resale discount would cause RNK's gross margin on these products to shrink, absent an increase in RNK's prices. To maintain current revenues, RNK would have to raise prices above those charged by Verizon, thus creating a disincentive for customers to switch to RNK from Verizon.

6. Beyond this direct loss of revenue and/or a shrinking customer base, RNK would likely lose toll revenues, as most (if not all) of RNK's resold local exchange customers also are presubscribed to RNK's facilities-based and resold intrastate and interstate long distance services.

7. RNK intends to participate as a full participant and take part in all issues that may substantially and specifically affect RNK.

8. Based on the foregoing, no other party adequately represents the interests of RNK in this proceeding.

9. The intervention of RNK will not impair the orderly and prompt disposition of this proceeding.

WHEREFORE, RNK Telecom, by and through it attorneys, respectfully requests that this Petition to Intervene be granted and that RNK Telecom be accorded full participant intervention status in this proceeding..

Respectfully submitted,

RNK, Inc.

By its Attorneys,

\_\_\_\_/s/\_\_\_\_\_

333 Elm Street, Suite 310  
Dedham, MA 02026  
(781) 613-6000

Dated: July 26, 2006